

From: [Sontag, John](#)
To: [Park, Andy](#); [Ferreira, Steve](#); ["Anthony Findley"](#); [Mark D. Fisher \(mfisher@elminc.com\)](#); [Ansari, Ramin](#); [Kirby, Lisa](#); [Ostapczuk, Eric](#); [Michael DiNunno](#); [Venkat Puranapanda \(Venkat.puranapanda@chubb.com\)](#)
Cc: [Peachey, Bryan](#); [Devorak, Coleen](#); [Schindler, Jason](#); [Sontag, John](#)
Subject: Hatco Quarterly Progress Report 62
Date: Wednesday, March 31, 2021 9:55:08 AM
Attachments: [ATT00001.txt](#)
[2020-03-31 Weston EPA-Progress Rpt 62.pdf](#)

All,

Attached please find a copy of the Quarterly Progress Report for remediation activities at the Hatco site. Feel free to contact me if you have any questions.

Thank you,

John

*John Sontag, Jr. PE
Client Account Manager*



*WESTON SOLUTIONS, INC.
1400 Weston Way
West Chester, PA 19380
610-701-3679 – Direct
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March 31, 2021

Mr. Andy Park, Acting Chief
Corrective Action Section
Hazardous Waste Programs Branch
U.S. EPA Region 2
290 Broadway, 25th Floor
New York, New York 10007-1866

Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, NJ 07095

Re: Hatco Site
Fords, NJ
Program Interest Number G000003943

Dear Mr. Park and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 62, which covers the activities associated with the Hatco Site from December 1, 2020, through February 28, 2021. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to contact me at (610) 701-3679.

Very truly yours,
WESTON SOLUTIONS, INC.

A handwritten signature in black ink, appearing to read "John Sontag, Jr.", is written over a light blue horizontal line.

John Sontag, Jr.
Client Account Manager

cc: S. Ferreira, (USEPA)
A. Findley (NJDEP)
M. Fisher – LSRP (ELM)
R. Ansari, L. Kirby, E. Ostapczuk (Hatco/LANXESS)
M. DiNinno (MCUA)
V. Puranapanda (CHUBB)



ADMINISTRATIVE CONSENT ORDER PROGRESS REPORT

1. Progress Report Number: 62
2. Site Location: Hatco Site
1020 King Georges Post Road
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
New Jersey Department of Environmental Protection
4. Reporting Period: December 1, 2020 through February 28, 2021
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 Weston submitted Progress Report Number 61 on December 29, 2020. By email dated January 8, 2021, Weston provided responses to USEPA comments on the progress report. Items 6.1, 6.3 and 6.8 have been expanded to note the clarifications.
 - 5.2 Weston provided monthly progress updates by email to the United States Environmental Protection Agency (USEPA) on January 8, February 4 and March 5, 2021.
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 Weston continued light non-aqueous phase liquid (LNAPL) recovery operations. Weston conducted recovery operations at the site using automated skimmer pumps and manual bailers. Total recovery through the end of this reporting period:
 - 10,719 gallons of LNAPL recovered using skimmer pumps and bailers since March 2011;
 - 3,200 gallons recovered and shipped offsite in liquid phase during the Southeast Leg remediation; and
 - 25,000 gallons estimated in LNAPL-saturated soils shipped for offsite disposal during the Southeast Leg remediation. The quantity was estimated as follows: 1,261 tons of LNAPL-saturated soil was shipped offsite for disposal during the Southeast Leg remediation project. Based on field observations Weston made the following assumptions regarding the quantity of LNAPL contained within the pore volume of that soil: The average soil density was 1.6 tons per cubic yard and the estimated soil porosity was 35%. This resulted in slightly more than 50,000 gallons of pore space. That volume was halved to estimate a conservative volume of approximately 25,000 gallons of LNAPL trapped within that pore space.
 - 6.2 Monthly progress meetings with the Licensed Site Remediation Professional (LSRP).
 - 6.3 Evaluation of properties adjacent to the Channel D/AOC 25 area, south of Riverside Drive, has identified several other likely sources of contamination to AOC 25. Weston is working with the property owners to evaluate these conditions. Weston

prepared the Supplemental Sampling Plan for AOC 25 to address data gaps identified in the northern portion of Channel D/AOC 25. The initial soil/sediment sampling was conducted in August 2020. Approximately 82 samples collected from 43 sample locations during the initial sampling event were compromised by the subcontract laboratory. Some of the samples were delayed by the shipping carrier and arrived outside of the temperature preservation threshold, and some were analyzed outside of the method holding time due to scheduling conflicts at the laboratory; including some QA/QC samples that impacted multiple other samples. The compromised samples were recollected from December 7 through December 10, 2020 and were analyzed by the subcontract laboratory without issue. The results are being evaluated for potential data gaps which will inform the scope of the next phase of sampling targeting deeper (>3 ft) samples predominately in the stream channels. The GP12 application for the deeper sampling was approved by NJDEP on January 13, 2021. It is anticipated that the next phase of sampling will be completed in early April 2021.

- 6.4 In July 2020, Weston submitted an Ecological Risk Assessment (ERA) Work Plan to NJDEP and EPA. The ERA Work Plan focused on developing a cleanup goal for BEHP in soil and sediment for the northern portion of the Channel D/AOC-25 wetland. NJDEP and EPA provided comments on the Work Plan to Weston on November 13, 2020. Weston's LSRP replied to USEPA and NJDEP by email dated December 7, 2020, requesting a meeting to discuss the comments. A conference call was held on February 25, 2021 with NJDEP and USEPA to discuss the comments on the Work Plan. The results of the next phase of sampling, currently planned for April 2021, are needed to refine the scope of the ERA.
- 6.5 Weston is working to complete the site-wide cap design and to finalize plans for the field sampling program that is needed to determine the final cap extent. Weston is currently preparing a preliminary work plan to clarify the capping approach.
- 6.6 An emergency permit modification to address additional streambank erosion in Slingtail Creek was granted by NJDEP on October 23, 2019. The permit modification was submitted to NJDEP on June 9, 2020. NJDEP issued the permit on December 2, 2020. Weston submitted mitigation plans to NJDEP on February 26, 2021. Mitigation construction will be scheduled pending NJDEP review and acceptance of the plans.
- 6.7 Weston has completed the remediation of Hatco-related contaminants identified in Woodbridge Pond sediments (Hatco AOC 24) and wetland restoration. The first annual wetland monitoring report was submitted on December 29, 2020. The Remedial Action Report and AOC-specific Response Action Outcome for AOC 24 were submitted on January 21, 2021.
- 6.8 Weston has prepared a Quality Assurance Project Plan (QAPP) addendum and permit modification application necessary to remove an isolated area of PCB-contamination identified in the wetland portion of the Crown Relocators property (part of Hatco AOC 23). Weston's last progress report identified the QAPP Addendum using the general term "work plan." Copies of the QAPP addendum were provided to regulators with the permit application on August 20, 2020. The permit application is currently being revised to address NJDEP comments. Remediation will be scheduled following NJDEP approval of the permit application.

- 6.9 Water was observed seeping out of the ground at the decommissioned seep interceptor vault system in early 2019. Iron staining was noted on the surface of the surrounding pavement. No evidence of LNAPL or PCB exceedances were detected in the samples of water from the vault in June 2019 and February 2020. During this quarterly reporting period, Weston pumped out the vault on December 2 and 21, 2020 and January 6 and 15, 2021, to prevent further seepage. Weston is working on plans to remove the structures associated with the vault.
 - 6.10 Weston is continuing preparation of the remedial action progress reports for the completed Southeast Leg, Northeast Impoundment and Former Lagoon Cap remediation projects.
 - 6.11 The revised draft Remedial Action Progress report for the Southeast Leg Pond Area Phase 1 Sample Results and Recommendations was provided to USEPA on January 19, 2021. USEPA provided comments on February 1 and 18, 2021. Weston is revising the draft report and the Phase 2 sampling program plans for regulatory review.
7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:
 - 7.1 Update scope and schedule for Channel D remediation.
 - 7.2 Implement Phase 2 sampling of the Southeast Leg Pond Area.
 - 7.3 Confer with USEPA to review preliminary engineering plans for site-wide capping of remaining contaminated soil.
8. Explanation for Each Item of Non-Completion in Item 7:
 - 8.1 Weston is currently in discussions with the property owners for Channel D and will update the scope and schedule based on those discussions.
 - 8.2 Weston is currently revising the planned Phase 2 sampling in response to USEPA and NJDEP comments received in February. The Phase 2 sampling will be scheduled after regulatory acceptance of the recommended program.
 - 8.3 Weston is currently preparing a preliminary work plan to clarify the capping approach. Weston will schedule a conference with USEPA when the work plan is ready.
9. Specific Requirements to be Initiated in Next Reporting Period (March - May 2021):
 - 9.1 Continue preparation of Southeast Leg, Northeast Impoundment, and Former Lagoon Cap Remedial Action Progress Reports.
 - 9.2 Confer with USEPA to review preliminary engineering plans for site-wide capping of remaining contaminated soil.
 - 9.3 Implement Phase 2 sampling of the Southeast Leg Pond Area.
 - 9.4 Preparations for remediation of contamination on Crown Relocations Property (AOC 23), pending permit approval.